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January 16, 2019

United States Federal Court
445 Broadway, Room 218
Albany, New York 12207

Attn: U.S. Magistrate Judge
Christian F. Hummel

Re: United States v. Xiaoqing Zheng
Case No.: 1:18-MJ-00434

Dear U.S. Magistrate Judge Hummel:

Our office represents Dr. Xiaoqing Zheng who was charged on July 5, 2018 on a criminal complaint with a single count of violating 18 U.S.C. § 1832(a)(1) entitled "Theft of Trade Secrets." Dr. Zheng has not been indicted.

At the time of Dr. Zheng's arraignment, the Court set certain conditions of release (a copy is enclosed herewith) which set forth the Court's directives pertaining to Dr. Zheng's activities. I have spoken to Kendra Rennie, the Pretrial Services Officer assigned to Dr. Zheng, who confirms that Dr. Zheng has been compliant with all the conditions imposed upon him.

Item (i) restricts Dr. Zheng's "travel to the Northern [District] of New York unless approved by Pretrial services or the court." Dr. Zheng's daughter was recently engaged, and the families are hoping to meet together for the first time at the RoseMary Inn, 88 Hainesburg River Road, Columbia, New Jersey on January 26, 2019. The meeting location is outside the Northern District of New York. Those in attendance would be Dr. Zheng, his wife, their two (2) daughters and one (1) son, and the fiancé of Dr. Zheng's daughter and his parents and two (2) sisters. The gathering is on January 26, 2019 in the evening and Dr. Zheng would be back in the district the morning of July 27, 2019. I spoke with Ms. Rennie and she takes no position with respect to Dr. Zheng attending the event and I am therefore submitting the request to Your Honor, asking for a modification of condition "(i)" to allow

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Dr. Zheng to leave the Northern District for a twenty-one (21) hour period beginning at approximately 3 p.m. on January 26, 2019 and ending the following morning, January 27, 2019 at 12 noon to attend this event.

I thank the Court for its time and consideration.

Very truly yours,

LUIBRAND LAW FIRM, PLLC



By: Kevin A. Luibrand, Esq.

KAL:abd

cc: Rick Belliss, AUSA
Kendra Rennie, Pretrial Services
Dr. Xiaoquing Zheng